

Dear Sir/Madam:

I am writing this note to offer my support of In Vitro methods to be used for any form of testing including (but NOT limited to) "Acute Systemic Toxicity". With such safe alternative testing methods in place, there should be no reason to continue with any painful, cruel and unnecessary animal testing. Animals are moral subjects with rights that must be protected. If we do not take the initiative and protect the incredible creatures of this world - who will? We are not masters of this universe, endowed with some absolute right to use and exploit other living beings. We are stewards of this planet and must start acting as such.

There is no moral justification in my mind to continue with any animal testing when other alternatives are available. Please review the below:

1. NIEHS should adopt the new non-animal test methods IMMEDIATELY. The non-animal test methods have been considered for almost 20 years, and animals should not continue to suffer and die because of bureaucratic inertia.
2. NIEHS recommends using the non-animal method to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough. Government agencies should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose tests.
3. At a minimum, ALL government agencies that currently require the acute animal-poisoning studies should IMMEDIATELY incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Please seriously consider this plea. If we consider ourselves to be a superior species, we must prove this by exercising compassion, love and respect for all living creatures.

Respectfully Yours,

Francey Pisicoli